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*Counsel for Cadence Innovation LLC and
PD George Co*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : **Chapter 11**
:
DELPHI CORPORATION, *et. al.*, : **Case No. 05-44481 (RDD)**
:
Debtors. : **Jointly Administered**
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**VERIFIED STATEMENT PURSUANT TO RULE 2019 OF
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE CONCERNING
MULTIPLE REPRESENTATION OF PARTIES IN INTEREST**

ALSTON & BIRD LLP (“Alston & Bird”), pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), files this statement in connection with its representation of two unsecured creditors in the above-captioned cases of the debtors and debtors-in-possession (the “Debtors”)¹, and respectfully states as follows:

¹ The Debtors include: Delphi NY Holding Corporation; Delphi Corporation; ASEC Manufacturing General Partnership; Delphi Medical Systems Colorado Corporation; Delphi China LLC, ASEC Sales General Partnership; Delphi Medical Systems Texas Corporation; Delphi Automotive Systems Overseas Corporation; Delphi Automotive Systems Korea, Inc.; Delphi Automotive Systems International, Inc.; Delphi International Holdings Corp.; Aspire, Inc.; Delphi Connection Systems; Delphi International Services, Inc.; Environmental Catalysts, LLC; Specialty Electronics International, LTD; Delphi Automotive Systems Thailand, Inc.; Delco Electronic Overseas Corporation; Delphi Technologies, Inc.; Delphi Automotive Systems (Holding), Inc.; Exhaust Systems Corporation; Delphi Medical Systems Corporation; Delphi Diesel Systems Corp.; Delphi Integrated Service Solutions, Inc.; Packard Hughes Interconnect Company; Delphi Electronics (Holding) LLC; Delphi Mechatronic Systems, Inc.; Specialty Electronics, Inc.; Delphi Automotive Systems Tennessee, Inc.; Delphi LLC; Dreal, Inc.; Delphi

1. Names and Addresses of Parties in Interest Represented by Alston & Bird:

Alston & Bird represents two parties in interest in the above-captioned Chapter 11 cases:

A. Cadence Innovation LLC (“Cadence”) as successor in interest to Patent Holding Company (“PHC”) is located at 6555 15 Mile Road, Sterling Heights, MI 48312.

B. PD George Co (“PD George”) is located at 5200 N. 2nd Street, Saint Louis, MO 63147.

2. The Nature of the Claims or Rights of the Parties in Interest and Times of Acquisition Thereof

The above-mentioned claims or rights of Cadence and PD George arise by virtue of their contractual, statutory, and/or common law rights with or against the Debtors, and/or by operation of law.

(a) Cadence is the holder of a prepetition general unsecured claim and postpetition administrative priority claim against the Debtors for their past and present direct and willful infringement of three patents owned by Cadence, reflected in Case No. 99-76013 pending in the District Court for the Eastern District of Michigan, Southern Division.

(b) The claims of PD George, a trade creditor in these Chapter 11 cases, arose out of the ordinary course of the Debtors’ prepetition business.

Automotive Systems Risk Management Corp.; Delphi Automotive Systems Services LLC; Delphi Liquidation Holding Company; Delphi Foreign Sales Corporation; Delphi Services Holding Corporation; Delphi Automotive Systems Human Resources LLC; Delphi Automotive Systems Global (Holding) Inc.; Delphi Automotive Systems LLC; Furukawa Wiring Systems LLC; Delphi-Receiveables LLC; and MobileAria, Inc.

3. Pertinent Facts and Circumstance in Connection with the Employment of
Alston & Bird

Alston & Bird has advised Cadence and PD George with respect to this concurrent representation.

4. Claims or Interests Owned by Alston & Bird

As of the time Alston & Bird was retained by the above-mentioned creditors, Alston & Bird held no claim against or interest in the Debtors.

Respectfully submitted, this 21st day of November 2006.

ALSTON & BIRD LLP

/s/ Dennis J. Connolly
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Counsel for Cadence Innovation LLC and
PD George Co

Verification—Alston & Bird LLP

I, Dennis J. Connolly, declare under penalty of perjury that I have read the foregoing statement and that it is true and correct to the best of my knowledge, information, and belief.

ALSTON & BIRD LLP

/s/ Dennis J. Connolly
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Sworn to and subscribed before me
this 21st day of November 2006.

/s/ Beverly A. Scott
NOTARY PUBLIC

My Commission Expires:

July 14, 2008